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February 23, 2018

**VIA REGULAR MAIL AND EMAIL**

Howard Mankoff, Esq.  
Marshall, Dennehey, Warner, Coleman & Goggin  
425 Eagle Rock Avenue  
Suite 302  
Roseland, New Jersey 07068

*Re: Valley Chabad, et al. v. Borough of Woodcliff Lake, et al.*

Dear Howard:

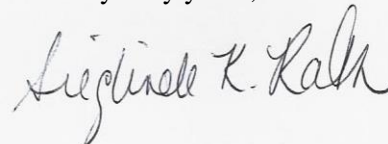
In furtherance of our recent discussions, this letter will confirm that the parties have agreed to a date of March 16, 2018 for the exchange of mutually outstanding discovery responses and document production.

There are several issues that we still need to address to facilitate same. The first is the issue of ESI production. I have attached a proposed Order regarding discovery which addresses this. Please review same and advise if it is acceptable. I want to ensure that both parties are providing documents in the same format and subject to the same understanding.

We had discussed the issue of the production of discoverable information contained within the personal email accounts of former and current Borough officials and staff. Please advise if this information will be produced as part of your responses to the outstanding discovery requests.

I look forward to hearing from you.

Very truly yours,



Sieglinde K. Rath